

March 18, 2003

Mr. Barry L. Carpenter  
Deputy Administrator, Livestock and Seed Program  
Agricultural Marketing Service, USDA  
Room 2029 South Building  
1400 Independence Avenue SW  
Washington, DC 20250

Dear Mr. Carpenter:

We, the undersigned organizations, are writing in regard to the December 20, 2002 Notice published by the Livestock and Seed Program for U.S. Standards for Livestock and Meat Marketing Claims. We represent a diversity of farmers, as well as agricultural, consumer, humane, and environmental organizations, all of whom have been engaged in some aspect of livestock and meat marketing claims. We commend the Department for its interest in these emerging markets and for raising concerns over the integrity of these market claims.

The lack of uniformity in these claims is, undoubtedly, what drove AMS to issue the Notice. We commend the agency for seeking public comment before instituting process verification systems for such claims and for seeking uniform application of such claims. We have very serious concerns with the proposals for antibiotics, free range, grass fed, and hormones. We therefore implore you to slow down, to analyze these claims individually, carefully, and to make determinations only after extensive public discussion.

We urge you to postpone finalizing meat marketing standards at this time. Furthermore, we ask that you undertake a more extensive and inclusive process that would allow input from a diverse group -- including consumers, agricultural organizations, and farmers, especially those who have built enterprises and niche markets related to some of these labeling claims -- and build consensus over uniform standards before applying a "USDA stamp of approval."

Specifically, we ask that you develop a more interactive process for getting input from producers about their production practices and their farming operations, possibly by inviting them to Washington, D.C. to meet and consult with Livestock and Seed experts in this area. We ask that you convene expert panels on the issue of alternative markets and meat marketing to better understand the diverse set of interests involved and the issues at stake. We encourage you to solicit marketing studies and consumer studies to better understand producer and consumer concerns related to "truth in labeling" issues. Recent events related to the organic label, including the organic feed issue, serve to highlight the depth of concern over truthful labeling claims.

Indeed, the complexity of issues embedded in each one of the proposed market claims merits extensive deliberation. Such deliberation requires economic analysis, comparison of production practices, an assessment of regional differences and constraints, and an understanding of consumer interests. After surveying the literature and reviewing the experiences of our organizations, we found little data concerning the claims in your December Notice and can identify only a few public fora where the details of one production approach versus another have been discussed. In talking to various stakeholders across the country, we also found some differences in the use of some terms by region. The bottom line, however, is that farmers and businesses marketing alternative livestock products and consumers seeking out those products want practices that are humane, environmentally sound, and take into consideration health and nutrition concerns.

We understand that the verification process is voluntary. However voluntary in nature, we expect that USDA, in setting minimum standards, will largely transform the marketplace and thus the actions taken by AMS will have far reaching implications for small and moderate sized farms and ranches who have made their livelihoods on such claims, including young farmers and ranchers who we desperately need to attract to production agriculture. By moving forward on partial information and flawed assumptions, AMS has the potential to compromise the integrity of these labels and to extinguish the promise these markets hold for key segments of agriculture.

Many of the farmers our organizations are in contact with are the pioneers of these marketing claims. It is essential that USDA work in partnership with these pioneers who took the initial risks and established successful markets now emulated by larger operations. We would like to pursue these thoughts and concerns with you further and request a meeting to discuss options for moving forward. We plan to respond in detail to the Notice by March 31, 2003. But we urge you to withdraw the proposal or extend the comment period to allow time for a more inclusive process to be implemented.

Thank you in advance for your time. Please contact Ferd Hoefner or Ann Wright with the Sustainable Agriculture Coalition (202/547-5754) so that we may arrange a meeting.

Sincerely,

Animal Welfare Institute

Center for Rural Affairs

Consumer Federation of America

Environmental Defense

Institute for Agriculture and Trade Policy

Keep Antibiotics Working: The Campaign to End Antibiotic Overuse

Land Stewardship Project

National Campaign for Sustainable Agriculture

National Family Farm Coalition

Natural Resources Defense Council

Organic Valley Family of Farms/CROPP Cooperative

Pennsylvania Association for Sustainable Agriculture

Sierra Club

Sustainable Agriculture Coalition

The Humane Society of the United States

Union of Concerned Scientists

*A number of these groups are Coalitions that represent a large number of member organizations, some of whom have signed on individually.*